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Attorney for the Class

**IN THE COURT OF COMMON PLEAS OF MONROE COUNTY, PENNSYLVANIA –
CIVIL DIVISION**

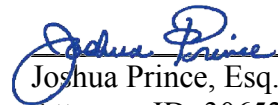
JOHN DOE 1, *et al*, : Civil Action No. 6384 cv 2015
: :
Plaintiffs, : **Class Action Complaint** – Pursuant
v. : to 18 PA.C.S. § 6111, Breach of
: Confidentiality, Invasion of Privacy,
MONROE COUNTY, *et al*, : and Declaratory and Injunctive
: Relief
Defendants. :

**PLAINTIFFS’ UNCONTESTED MOTION FOR FINAL APPROVAL OF
SETTLEMENT, AN AWARD OF INCENTIVE PAYMENTS FOR REPRESENTATIVE
PLAINTIFFS, AND AN AWARD OF ATTORNEYS’ FEES AND COSTS TO CLASS
COUNSEL**

The named Plaintiffs in this action (the “Plaintiffs”), by and through their attorneys, hereby move for final approval of the Settlement between the Parties, an award of incentive payments for the Class Representatives, and an award of attorneys’ fees and costs to Class Counsel, based on the accompanying Memorandum of Law and exhibits, which are incorporated herein by reference.

Respectfully Submitted,

Date: September 23, 2020



Joshua Prince, Esq.
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**IN THE COURT OF COMMON PLEAS OF MONROE COUNTY,
PENNSYLVANIA – CIVIL DIVISION**

JOHN DOE 1, <i>et al</i> ,	:	Civil Action No. 6384 cv 2015
	:	
Plaintiffs,	:	Class Action Complaint – Pursuant
v.	:	to 18 PA.C.S. § 6111, Breach of
	:	Confidentiality, Invasion of Privacy,
MONROE COUNTY, <i>et al</i> ,	:	and Declaratory and Injunctive
	:	Relief
Defendants.	:	

DECLARATION OF JOSHUA PRINCE, ESQ.

I, Joshua Prince, Esq. of Prince Law Offices, P.C. hereby declares and says the following in support of Plaintiffs’ Motion for Final Approval of Settlement, an Award of Incentive Payments for Class Representatives, and an Award of Attorneys’ Fees and Costs to Class Counsel:

1. I am lead counsel in the above-captioned matter.
2. Attorney Adam Kraut is co-counsel in the above-captioned matter.
3. In litigating this matter, the aforementioned counsel (collectively, “Plaintiffs’ Counsel”) were required to record their billings, including their individual hourly rate, time and description, as well as, any paralegal or staff time, to my for review and compilation.
4. The staff at my office took all of the time and billing records provided by Plaintiffs’ Counsel and reconciled the time provided by each attorney.
5. I personally reviewed all the billings, which were reconciled.
6. Each of Plaintiffs’ Counsel has attested that the time provided to me is true, correct and accurate to the best of their information, knowledge and belief.
7. Plaintiffs’ Counsel’s hourly rate is \$500.00, per hour.

8. The hourly rate of Plaintiffs' Counsel's staff and paralegals is \$125 per hour.

9. Plaintiffs' Counsel, as of September 24, 2020, had spent in excess of 976 hours litigating this matter, resulting in a time value of more than \$488,000.

10. As of September 24, 2020, the staff/paralegals of Plaintiffs' Counsel had more than 72 hours expended in litigating this matter, resulting in a time value of more than \$9,000.


11. As of September 24, 2020, the costs incurred by Plaintiffs' Counsel in litigating this matter are \$4,385.82. This amount does not include the \$72,000 paid to the Class Administrator by the Defendants from the Settlement Fund.

12. Plaintiffs' Counsel is currently expending additional time working with the Class Administrator and in the drafting/finalizing of the Motion for Final Approval, the memorandum in support and accompanying documents. Moreover, Plaintiffs' Counsel will also expend additional time and costs in preparation for the Final Approval Hearing on October 8, 2020, as well as, in attendance at the Final Approval Hearing.

13. Therefore, Plaintiffs' Counsel expects that the total time value for Plaintiffs' Counsel and their staff/paralegals will be in excess of \$520,000.00 by the conclusion of the Final Approval Hearing, plus costs and expenses of approximately \$4,385.82.

Respectfully Submitted,

Date: September 23, 2020



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**IN THE COURT OF COMMON PLEAS OF MONROE COUNTY,
PENNSYLVANIA – CIVIL DIVISION**

JOHN DOE 1, <i>et al</i> ,	:	Civil Action No. 6384 cv 2015
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Plaintiffs,	:	Class Action Complaint – Pursuant
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	:	Confidentiality, Invasion of Privacy,
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	:	Relief
Defendants.	:	

CERTIFICATE OF SERVICE

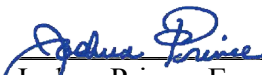
The undersigned counsel hereby certifies that on September 23, 2020, a true and correct copy of *Plaintiffs’ Uncontested Motion for Final Approval of Settlement, An Award of Incentive Payments for Representative Plaintiffs, and an Award of Attorneys’ Fees and Costs to Class Counsel* and memorandum in support was served on the following:

(Courtesy Copy – via email)
The Honorable Russell Shurtleff
Wyoming County Courthouse
One Courthouse Square
Tunkhannock, PA 18657

Via email
Attorney Janelle Fulton
433 W. Market Street
Suit 200
West Chester, PA 19382

Via US Mail
Prothonotary of Monroe County
Monroe County Court House,
610 Monroe Street,
Stroudsburg, PA 18360

Respectfully Submitted,



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